25

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA



BLACKWATER SECURITY CONSULTING, LLC, a Delaware Limited Liability Company; and BLACKWATER LODGE AND TRAINING CENTER, INC., a Delaware Corporation

Plaintiffs,

VS.

WESTCHESTER SURPLUS LINES INSURANCE COMPANY, a Georgia Corporation

and

EVANSTON INSURANCE COMPANY, an Illinois Corporation

and

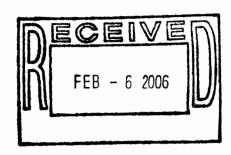
FIDELITY AND CASUALTY COMPANY OF NEW YORK, a South Carolina Corporation

and

LIBERTY INSURANCE UNDERWRITERS, a Massachusetts Corporation

Defendants.

CIVIL ACTION NO. 05-6020



FILED

FEB 2 1 2006

MICHAELE. KUNZ, Clerk V Dep. Clerk

STIPULATION ADDITIONAL EXTENSION OF TIME

It is hereby stipulated by and between Francis J. Deasey, Esquire, counsel for Defendant, Westchester Surplus Lines Insurance Company and Howard Wier, Esquire, counsel for Plaintiffs, Blackwater Security Consulting, LLC and Blackwater Lodge and Training Center, Inc. that the time within which Defendant, Westchester Surplus Lines Insurance Company must file an Answer to Plaintiffs' Complaint is hereby extended up to and including February 9, 2006 (the Answer is presently due pursuant to the initial extension of time on January 30, 2006) due to the illness of counsel for Westchester Surplus Lines Insurance Company.

HARVEY BARTLE, IV, ESQUIRE (ID #91566)

Morgan, Lewis & Bockius, LLP 1111 Pennsylvania Avenue NW

Washington, DC 20004

202-739-3000 (PHONE)/202-739-3001 (FAX)

BY: /s/ Francis J. Deasey (Valid Code FD1214)
/s/ James W. Daly (Valid Code JD1216)

FRANCIS J. DEASEY, ESQUIRE (ID 25699)

JAMES W. DALY, ESQUIRE (Atty. ID 37660)

Deasey, Mahoney & Bender, Ltd.

1800 John F. Kennedy Boulevard, Suite 1300

Philadelphia, PA 19103

215-587-9400 (PHONE)/215-587-9456 (FAX)

fideasey@dmbphila.com

iwdaly@dmpphila.com

1) Jucku J.

Kewil Conver

210 REQUEST ans. Noe 1/30

Dockets Justia.com

Plaintiff requests that the Court reverse the decision of the Commissioner and rule that she may receive benefits. In the alternative, Plaintiff requests that the Court remand the matter to the Commissioner for receipt of further evidence.

Respectfully Submitted,

EAS5913

ERIC A. SHORE, ESQUIRE 1015 Chestnut Street, Suite 702 Philadelphia, PA 19107 (215) 627-9999 Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, Eric A. Shore, Esquire, hereby certify that on the day of 2006, I electronically filed with the Clerk of Court a true and correct copy of the foregoing Plaintiff's Motion for Summary Judgment and Brief.

EAS5913 ERIC A. SHORE, ESQUIRE Attorney for Plaintiff

FILED

FEB 1 7 2006

MICHAEL E. KUNZ, Clerk By_____Dep. Clerk